

FILED

SEP 26 2019

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.) No. S1-4:19-CR-00750-RWS-NAB
)
BRAD RICE,)
)
Defendant.)

SUPERSEDING INDICTMENT

COUNT ONE

The Grand Jury charges:

From on or about December 1, 2018, continuing until on or about April 1, 2019, within the Eastern District of Missouri, the defendant,

BRAD RICE,

had knowledge of an event affecting his right to receive or to continue to receive payments from Social Security Administration Title II benefits, and concealed or failed to disclose that event to the Social Security Administration, with the intent to fraudulently secure payment of Title II benefits either in an amount greater than was due or when no payment was authorized, to wit:

BRAD RICE had been regularly working and earning income as an employee of Huntsville Machine and as an owner of a lawn care business, and failed to disclose the entirety of this work and income to the Social Security Administration.

In violation of Title 42, United States Code, Section 408(a)(4).

COUNT TWO

The Grand Jury further charges:

From on or about December 1, 2018, continuing until on or about May 1, 2019, within the Eastern District of Missouri, the defendant,

BRAD RICE,

did embezzle, steal, purloin, or knowingly convert to his use, and the use of others, money of the United States or of any department or agency thereof, or any property made or being made under contract for the United States or any department or agency thereof, to wit: \$9,345.00 in the form of Social Security Administration Disability Insurance benefit payments, creating a total loss to the government in excess of \$1,000.00.

In violation of Title 18, United States Code, Section 641.

A TRUE BILL.

FOREPERSON

JEFFREY B. JENSEN,
United States Attorney

DIANE E.H. KLOCKE, #61670MO
Special Assistant United States Attorney